

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION**

In re:

RMS TITANIC, INC., *et al.*,¹

Debtors.

Case No. 3:16-bk-02230-PMG
Chapter 11

(Joint Administration Requested)

**STATEMENT OF KALEO LEGAL
UNDER 11 U.S.C. § 329 AND RULE 2016(b)
OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURES**

Pursuant to 11 U.S.C. § 329 and Rule 2016(b) of the Federal Rules of Bankruptcy Procedure, Kaleo Legal (“Kaleo”) states that it has been retained to represent Debtors RMS Titanic, Inc. and certain of its affiliates as special litigation counsel, outside general counsel, securities counsel, and conflicts counsel in connection with this Chapter 11 case.

Kaleo currently holds a pre-Petition Date retainer of approximately \$15,000 for services to be rendered in contemplation of or in connection with the Chapter 11 case.²

The undersigned further states that Kaleo has not shared, or agreed to share (a) any compensation or reimbursement with another person, other than members, partners

¹ The Debtors in the chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number include: RMS Titanic, Inc. (3162); Premier Exhibitions, Inc. (4922); Premier Exhibitions Management, LLC (3101); Arts and Exhibitions International, LLC (3101); Premier Exhibitions International, LLC (5075); Premier Exhibitions NYC, Inc. (9246); Premier Merchandising, LLC (3867), and Dinosaurs Unearthed Corp. (7309). The Debtors’ service address is 3045 Kingston Court, Suite I, Peachtree Corners, Georgia 30071.

² Within one year preceding the Petition Date, Kaleo received regular payments from the Debtors on account of fees for services rendered in connection with various litigation matters unrelated to the Chapter 11 case in which Kaleo historically represented the Debtors.

or regular associates of the undersigned law firm, or (b) any compensation for reimbursement received by another person.

KALEO LEGAL

By /s/ Brian A. Wainger
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*Proposed Special Litigation Counsel, Outside
General Counsel, Securities Counsel, and Conflicts
Counsel for the Debtors and Debtors in Possession*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was electronically filed with the Clerk of the Court using CM/ECF on June 20, 2016. I also certify that the foregoing document is being served this day on the following counsel of record via transmission of Electronic Filing generated by CM/ECF:

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Via FedEx

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/s/ Daniel F. Blanks

Attorney